# Elements of a Compliance and Ethics Program

Seven minimum requirements constituting the "hallmarks" of an effective compliance and ethics program, which serve as "indicators of program performance":[1]

1. Standards and procedures to prevent and detect criminal conduct;

2. Responsibility at all levels of the program, together with adequate program resources and authority for its managers;

3. Due diligence in hiring and assigning personnel to positions with substantial authority;

4. Communicating standards and procedures, including a specific requirement for training at all levels;

5. Monitoring, auditing, and non-retaliatory internal guidance/reporting systems, including periodic evaluation of program effectiveness;

6. Promotion and enforcement of compliance and ethical conduct; and

7. Taking reasonable steps to respond appropriately and prevent further misconduct upon detecting a violation

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[1] U.S. Sentencing Commission's Federal Sentencing Guidelines for Organizations